

**Applying Universal Law of Location as a
Land Use Planning Decision Tool: Municipal
Government Data, Evidence, and Research
Studies Must be Upgraded to Enable
Informed Decisions that Best Use and
Preserve the Province's Threatened
Agricultural Land Inventory**

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Are municipal councils ensuring that Ontario is preserving and protecting sufficient agricultural land to guarantee the province's food security in perpetuity, or even 25 years?

April 2025

A. Background

The Universal Law of Location states that something is everywhere under, on, and above the Earth's surface ([Universal Law of Location Supported by GIS as a Best Practice Element in Land Use Planning and Transportation Planning Decision Systems](#)). This case study continues the process of testing the Universal Law of Location as a land use planning and transportation planning decision tool.

The criterion of utility with its focus on “practical use” is selected for the first series of tests to assess the value of the Universal Law of Location as a land use planning decision tool. Synonyms of the concept of utility include accountability, applicability, benefit, effectiveness, efficiency, functionality, pertinence, practicality, relevance, suitability, transparency, and usefulness.

The fundamental point in choosing this route is that if the Universal Law of Location satisfies the utility condition, and many to most of the synonyms of utility, then the Law is likely to be of value to planners, provincial and municipal politicians, and citizens.

And, conversely, if the Universal Law of Location is not found to satisfy the utility condition, and many to most of the synonyms of utility, then the Law is not likely to be of value to planners, planners, provincial and municipal politicians, and citizens.

Three case studies have been completed to date.

The first test case study investigates the 2022 municipal campaign pledge of mayoral candidate Mark Sutcliffe and now-mayor Mark Sutcliffe, City of Ottawa, to achieve 1,000,000 tree plantings in the current term of office, 2022-2026. ([Universal Law of Location as a Land Use Planning Decision Tool: Analysis of Ottawa Mayor's Pledge to Plant 1,000,000 Trees](#))

That case study affirmed the utility of the Universal Law of Location as a land use planning tool by its contributions to:

- A. Enhancing data for data-driven decisions about where to locate trees and how to monitor tree-planting activities.
- B. Enhancing evidence for evidence-based decisions about where to locate trees and how to monitor tree-planting activities.
- C. Proposing terms of reference for data-driven or evidence-based studies to support decisions about where to locate trees and how to monitor tree-planting activities.

The second test case study uses the Universal Law of Location as a tool to ascertain whether, how, and with what consequences the provincial government takes geographic considerations into account in statements and decisions involving gridlock, congestion, and the removal of bike lanes in cities in Ontario. ([Applying Universal Law of Location as a Transportation Planning Decision Tool: Ontario Government Data and Evidence Fail to Support Positions on Gridlock, Congestion, and Removal of Bike Lanes](#))

The first general conclusion is that the Universal Law of Location contributes to enhancing data and evidence for decisions about gridlock, congestion and removal of bike lanes, and contributes terms of reference for data-driven and evidence-based studies to support decisions regarding gridlock, congestion, and removal of bike lanes in Ontario municipalities.

Regarding the Ontario government positions on gridlock, congestion, and removal of bike lanes, the findings are as follows based on obtained materials.

1. The position on gridlock is not supported by data or evidence to establish its existence for even one gridlock event in Ontario history, which further consigns the notion of gridlock to transportation fantasyland.
2. To the extent that concerns about congestion are based on fantasy notions about gridlock, the concerns about congestion cannot be described by data nor demonstrated by evidence, which is a natural consequence of building a case on a fantasy foundation.
3. To the extent that concerns about congestion are attributed to the installation of bike lanes, no data and no evidence that describe and establish a consequential causal relationship were located.
4. To the extent that congestion relief is attributed to the removal of bike lanes, no data and no evidence that describe and establish a consequential causal relationship were located.
5. To the extent that the installation of bike lanes is deemed to have a consequential causal relationship with the increased incidence of motor vehicle congestion, no data or evidence that describe and establish that relationship were located.
6. To the extent that the removal of bike lanes is deemed to have a consequential causal relationship with the decreased incidence of motor vehicle congestion, no data and no evidence that describe and establish that relationship were located.

The second general conclusion is that the Universal Law of Location which states that something is everywhere below, on and above the Earth's surface is an effective, efficient, and directive means of analysing the data and evidence describing Ontario government positions and decisions on gridlock, congestion and removal of bike lanes.

The third test case study is in the land use planning domain, the focus is on agricultural land, and involves provincial and municipal governments, both of which make decisions affecting the province's inventory of agricultural land and, consequently, the state of food security in Ontario. ([Applying Universal Law of Location as a Land Use Planning Decision Tool: Ontario Government Data, Evidence, and Research Studies Must be Upgraded to Enable Informed Decisions that Best Use and Preserve the Province's Threatened Farmland Inventory](#))

By its role in identifying needed upgrades to the province's body of data used to make decisions that affect Ontario's agricultural land inventory, the Universal Law of Location passes the first utility test as a land use planning and decision tool.

By its role in identifying needed upgrades to the province's body of evidence used to make decisions that affect Ontario's agricultural land inventory, the Universal Law of Location passes the second test of utility as a land use planning and decision tool.

By its role in identifying needed research study upgrades to enhance the body of data and evidence used to make decisions that affect Ontario's agricultural land inventory, the Universal Law of Location passes the third test of utility as a land use planning and decision tool.

The present case study extends the theme of case study three by focusing on the contribution by Ontario's municipal governments to the state of the province's agricultural land inventory.

B. Comment on How the Provincial-Municipal Relationship Affects Decisions About Ontario's Agricultural Land Inventory

Context for this comment is provided by Table 1 in the previous report, [Applying Universal Law of Location as a Land Use Planning Decision Tool: Ontario Government Data, Evidence, and Research Studies Must be Upgraded to Enable Informed Decisions that Best Use and Preserve the Province's Threatened Farmland Inventory](#).

In Ontario, municipal governments are frequently referred to as “creatures of the province”, because the parameters for their policy, program, plan, and operations decisions and actions are largely set by the provincial government. **(1)**

Or expressed another way, municipal governments implement policy, program, plan, and operations edicts, instructions, orders, etc., contained in provincial legislation and whatever other means the provincial government uses to express what it wants done on its behalf by the 444 municipal governments in Ontario. (2)

Table 1. Chapters in the Background Story for Selecting Ontario's Agricultural Land Inventory to Test of the Utility of the Universal Law of Location

1. National perspective on Canada's rural communities, 1950s-1970s
2. Ontario Planned? 1970s-1980s
3. Doomsday Map projections, 1980s-1990s
4. Sustainable development movement, 1990s+
5. Climate change, reckless resource exploitation, and Doomsday Mapping of real data and real evidence using GIS, 1980s+
6. Food security, 2020s+

As noted by all the chapters in Table 1, land is one of the entities for which the provincial government and 444 municipal governments have a shared interest.

By way of illustration, at the provincial level at least 11 ministries including

- Agriculture, Food and Agribusiness,
- Economic Development, Job Creation and Trade,
- Energy and Electrification,
- Environment, Conservation and Parks,
- Infrastructure,
- Mines,
- Municipal Affairs and Housing,
- Natural Resources,
- Northern Development,
- Rural Affairs, and
- Transportation,

have a land component in their portfolios because the entities dealt with by those ministries need to be located somewhere under, on, or above the Earth's land surface.

(<https://www.ontario.ca/page/ministries>)

Further, of those 11 ministries, eight of them

- Economic Development, Job Creation and Trade,
- Energy and Electrification,
- Infrastructure,
- Mines,
- Municipal Affairs and Housing,
- Natural Resources,
- Northern Development, and
- Transportation,

are associated with non-agricultural land use activities that are located or are proposed to be located under, on, or above agricultural land.

(<https://www.ontario.ca/page/ministries>)

As for the three remaining ministries,

- Agriculture, Food and Agribusiness,
- Environment, Conservation and Parks,
- Rural Affairs,

the broad statements about their mandates are just barely useful for a case study seeking to ascertain whether the data, evidence, and research studies used in municipal government decisions that affect Ontario's agricultural land inventory need to be upgraded.

First, the Ministry of [Agriculture, Food and Agribusiness](#) states that its mandate is "Growing Ontario's agri-food sector and helping to create a stronger economy for the province". Perhaps it is also implicitly charged with preserving and protecting the province's agricultural land inventory to ensure that the growing objective is achieved, but a declaration with details in that regard could not be found.

Second, the Ministry of [Rural Affairs](#) states that its mandate is "Ensuring prosperity across the province by supporting business development and vibrant communities in rural Ontario". Perhaps it is also implicitly charged with preserving and protecting the province's agricultural land inventory to ensure that the prosperity objective is achieved, but a declaration with details in that regard could not be found.

Third, the Ministry of [Environment, Conservation and Parks](#) states that its mandate is "Leading to healthier communities and economic prosperity through protecting Ontario's air, land and water". Perhaps it is also implicitly charged with preserving and protecting the province's agricultural land inventory to ensure that the leading objective is achieved, but a declaration with details in that regard could not be found.

In terms of provincial government oversight of the municipal file on Ontario's agricultural land inventory, therefore, it is far from conscientious parenting to say the least.

That is, while media statements by provincial politicians are encountered which refer to preserving and protecting the province's agricultural land inventory and/or its farmland inventory, it appears fair to say as per [Applying Universal Law of Location as a Land Use Planning Decision Tool: Ontario Government Data, Evidence, and Research Studies Must be Upgraded to Enable Informed Decisions that Best Use and Preserve the Province's Threatened Farmland Inventory](#), that there is a serious lack of prudent direction in the provincial government's position on the data, evidence, and research studies that municipal governments are to use in making decisions that negatively affect the province's agricultural land inventory and its food security position.

A fair summary comment appears to be that although the provincial government has an institutional presence in the agricultural land file, it has a much greater interest in converting that land from agricultural to non-agricultural use. And, I hasten to add, confirmation of that observation appears to follow from the total lack of engagement by Agriculture, Food and Agribusiness and Rural Affairs in the previous study, [Applying Universal Law of Location as a Land Use Planning Decision Tool: Ontario Government Data, Evidence, and Research Studies Must be Upgraded to Enable Informed Decisions that Best Use and Preserve the Province's Threatened Farmland Inventory](#).

Turning now to municipal governments, every municipality in Ontario occupies land which may be under one or more authorities, such as First Nations authority, public governance authority (federal, provincial, territorial, municipal), and private authority (e.g. individual, co-op, non-governmental organization, and corporate).

Our interest in this report is on ascertaining where and when decisions by 19 selected municipal governments affect their agricultural land inventories and, by extension, the province's overall agricultural land inventory.

Further, to add a degree of specificity, our interest is in the non-agricultural uses of land which displace agricultural land in the 19 selected municipal governments and, by extension, other municipalities in the province.

Which brings us to the provincial-municipal comparison on the agricultural land file.

While there is far from one-to-one correspondence between the structures and functions of municipal governments and those of the Ontario provincial government, there is reason for concern about the implications of under-representation on the agricultural land file on municipal councils.

For example, there could be four, six, eight, ten, twelve or more committees of council which are constantly looking for places to locate such non-agricultural land uses as subdivisions, shopping centres, schools, roads, warehouses, condominiums, golf courses, industrial parks, business parks, jails, detention centres, arenas, and quarries.

Further, to expand on the concern perspective, there could be limitations on land zoned for a non-agricultural use such as industrial, for example, including situations where the needed land does not exist in an area under current zoning, it is insufficient in overall amount, it is in a compromised location, and swaps between non-agricultural land uses cannot be achieved.

In those kinds of circumstances, prospects do not bode well for the lone committee of council or even several committees charged with preserving and protecting a municipality's agricultural land inventory.

Or, to re-phrase, since something is already everywhere, the annual provincial loss of, let us say, more than 125,000 acres of agricultural land points to the need to ask municipal councils about their role in the loss of agricultural land to non-agricultural uses within, adjacent to, or proximal to their boundaries.

Which brings me to consideration of the "fell between the chairs" excuse or default lament which is frequently used to account for inter-governmental failures on policy, planning, and other matters.

As reported from the case study, [Applying Universal Law of Location as a Land Use Planning Decision Tool: Ontario Government Data, Evidence, and Research Studies Must be Upgraded to Enable Informed Decisions that Best Use and Preserve the Province's Threatened Farmland Inventory](#), we were unable to obtain hard, relevant numbers from the provincial government about the current, medium-term, and long-term state of Ontario's agricultural land inventory.

This report suggests that the reason for the shortfall on openness and readily available documentation about data, evidence, and research studies describing the state of Ontario's agricultural land inventory resides in the limited regard shown by provincial governments for agricultural land use matters relative to non-agricultural land use matters.

Further, [Applying Universal Law of Location as a Land Use Planning Decision Tool: Ontario Government Data, Evidence, and Research Studies Must be Upgraded to Enable Informed Decisions that Best Use and Preserve the Province's Threatened Farmland Inventory](#) established in detail that this lack of regard is not due to lack of provincial governments' micro-managing of the affairs of municipal governments.

Rather, it is due plain and simple to the limited regard for the agricultural land file and, by extension, lack of regard for food security.

A reasonable working hypothesis, therefore, is that the same disproportionate regard holds in some and perhaps even many municipal governments.

Should that concern be found to be the case, then what we have is a stellar illustration of the “falling through the cracks” phenomenon within and between the provincial and municipal governments.

That is, neither level of government serves as champion of the province's agricultural land inventory, neither takes responsibility for the state of the inventory, and neither meets standards of transparency and accountability which are needed by citizens, researchers, interest groups, journalists, and others seeking to ensure that Ontario's agricultural land inventory is sufficient to meet food security needs indefinitely in both time and space. **(3)**

With that commentary on concerns about agricultural land issues falling through the cracks within and between provincial and municipal governments, section C presents the terms of reference for investigating the utility of the Universal Law of Location as an agricultural land use planning decision tool for municipal governments.

C. Case Study Objective

Given the success of the first, second, and third test case studies, the fourth test follows suit with necessary language changes.

The language focus in this case study includes such terms as agriculture, climate change, data, decision, development, ecosystem, evidence, farmland, food, geographical, GIS, highest and best use, inventory, land, location, mapping, municipal government, planning, provincial government, rural, security, non-agricultural, self-sufficiency, soil, spatial, stewardship, sustainability, and zero-sum.

Following from the discussion in [Universal Law of Location Supported by GIS as a Best Practice Element in Land Use Planning and Transportation Planning Decision Systems](#), there are three general tests for assessing the utility of the Universal Law of Location as an agricultural land inventory decision tool. That is, whether the Law:

1. Contributes to upgrading Ontario governments' data on the province's agricultural land inventory.
2. Contributes to upgrading the evidence used by Ontario governments to make decisions that affect the province's agricultural land inventory.

3. Contributes to terms of reference for data-driven and evidence-based studies to upgrade decisions that affect the province's agricultural land inventory and its state of food security.

There are specific tests of utility of the Universal Law of Location within each of the general tests. We consider as many as possible within the time frame and resources assigned for this case study.

Discussions about upgrading data, upgrading evidence, and contributing terms of reference for research studies are presented in Sections D, E, and F, respectively. In addition, preliminary comments are made in section G about research studies into upgrading the bodies of information and knowledge on applying highest and best use principles and practices to decisions by municipal government which affect their agricultural land inventories.

However, before getting to the test stage, it is necessary to discuss the three types of documentation to be considered in Sections D, E, F, and G, and Appendix A.

One type of documentation consists of the existing bodies of data, evidence, and research studies which are already part of municipal records.

In the case of data records on agricultural lands, they are specified, collected, stored, processed, and disseminated by or by authority of municipal governments. Conditions of access to these records are set by municipal governments.

Bodies of evidence assembled by municipal governments for Official Plan, zoning by-laws, budgets, and other purposes are within the purview of municipal governments. Conditions of access to these records are set by municipal governments.

Finally, municipal governments undertake and fund research studies, and participate in research studies into the bodies of data and evidence used to modify existing legislation, policies, plans, programs, and operations, develop new legislation, policies, plans, programs, and operations, etc.

That is a massive body of documentation, and this case study will examine only as much of that documentation as needed to conduct tests of the utility of the Universal of Law of Location as an agricultural land inventory decision tool.

D. Communications Providing Context for Sections E, F, G, H, and I

In the previous case study ([Applying Universal Law of Location as a Land Use Planning Decision Tool: Ontario Government Data, Evidence, and Research Studies Must be Upgraded to Enable Informed Decisions that Best Use and Preserve the Province's](#)

[Threatened Farmland Inventory](#)), communications were sent to two provincial government ministers – Rob Flack, Agriculture Agri-Business and Food, and Lisa Thompson, Rural Affairs, six advocacy groups (Agricultural Adaptation Council; Farm & Food Care; Ontario Association of Agricultural Societies; Ontario Farmland Trust; Ontario Federation of Agriculture; and Ontario Soil and Crop Improvement Association), and the councils of 19 municipal governments. Table 2 lists the 19 municipal governments selected for the case study.

**Table 2. Municipal Governments Selected for Case Study Four:
Testing the Utility of the Universal Law of Location as an
Agricultural Land Use Planning Decision Tool**

Bradford-West	Guelph (City)	Ottawa (City)
Gwillimbury (Town)	Halton (Region)	Peterborough (City)
Brampton (City)	Hamilton (City)	Temiskaming Shores (City)
Brantford (City)	London (City)	Vaughan (City)
Cambridge (City)	Markham (City)	Wellington (County)
Dufferin (County)	Newmarket (Town)	Wilmot (Township)
Grimsby (Town)	Niagara (Region)	

In the communication to 19 municipal government councils, they were asked to inform IRB of activities undertaken or authorized this term and the previous term, to review and evaluate the data, evidence, and studies used to make decisions that affect the province's agricultural land inventory and, consequently, the robustness of the province's food supply and level of food security.

IRB records do not show a response by any the 19 municipal government councils in the above regard, and none responded to an email regarding their community being named as a contributor to the report, [Applying Universal Law of Location as a Land Use Planning Decision Tool: Ontario Government Data, Evidence, and Research Studies Must be Upgraded to Enable Informed Decisions that Best Use and Preserve the Province's Threatened Farmland Inventory](#).

In that same communication, the 19 municipal government councils were asked to inform me of:

1. Communications by the provincial government during this term and the previous term that affect the municipality's agricultural land inventory.

2. Communications by the provincial government this term and the previous term that question or challenge the municipality's data, evidence, or studies used to make decisions that affect Ontario's agricultural land inventory.
3. Communications by the municipality that question or challenge the data, evidence, or studies used by provincial agencies to make decisions that affect Ontario's agricultural land inventory.
4. Communications by the municipality that question or challenge the data, evidence, or studies used by private sector entities to comment on decisions that affect Ontario's agricultural land inventory.
5. Communications by the municipality that question or challenge the data, evidence, or studies used by public interest groups to comment on the municipality's decisions that affect Ontario's agricultural land inventory.
6. Communications by the municipality that question or challenge the data, evidence, or studies used by vested interest groups to comment on the municipality's decisions that affect Ontario's agricultural land inventory.
7. Communications by the municipality that question or challenge the data, evidence, or studies used by academic and other researchers to comment on the municipality's decisions that affect Ontario's agricultural land inventory.
8. Communications by the municipality that question or challenge the data, evidence, or studies used by journalists to comment on the municipality's decisions that affect Ontario's agricultural land inventory.
9. Communications by the municipality that question or challenge the data, evidence, or studies used by citizens to comment on the municipality's decisions that affect Ontario's agricultural land inventory.

IRB records do not show a response by any the 19 municipal government councils in the above regard, and none responded to an email regarding their community being named as a contributor to the report, [Applying Universal Law of Location as a Land Use Planning Decision Tool: Ontario Government Data, Evidence, and Research Studies Must be Upgraded to Enable Informed Decisions that Best Use and Preserve the Province's Threatened Farmland Inventory](#).

The non-responses from 19 councils seem to be a denial of reality, therefore, given the 80 entries in Table 3, A Selection of Links to Productions Which "Call into Question" Data, Evidence, or Studies Used by the Government of Ontario as the Basis of Decisions Affecting Ontario's Agricultural Land Inventory.

Further, it seems most likely council members are aware that the list of 80 entries is a small fraction of those in broadcast media and social media which ask questions about, take issue, challenge, have concerns about, or otherwise signal dissatisfaction with data, evidence, or studies used by the Government of Ontario as the basis of decisions affecting Ontario's agricultural land Inventory.

Moreover, each of those municipal governments has agricultural land within, adjacent to, or proximal to its municipal boundary.

Further, all of them receive development applications for non-agricultural land uses within their municipal boundaries, and most if not all of them are affected by development applications to locate non-agricultural land uses on agricultural land adjacent to or proximal to its municipal boundary.

Since it seems a remote possibility that any member of any of those councils has not been informed of non-agricultural pressure on agricultural lands during the 2018-2025 span, the reference to "denial of reality" might be overly kind. **(4)**

And the level of concern about the group non-response deepens when the following realizations are considered.

1. Ontario's agricultural land inventory is being reduced by more than 125,000 acres per year, and many of those acres are within the municipal boundaries governed by the councils selected for this case study.
2. The Universal Law of Location states that something is everywhere, which means that every land-related decision by a municipal council affects some aspect of Ontario's overall land inventory. It therefore seems apparent from the perspective of good planning and good land management in general that municipal councils selected for this case study have records to share about their communications with the provincial government regarding the state of their respective shares of Ontario's agricultural land inventory.
3. We know from the zero-sum condition that for a given boundary there are limits to how many acres of agricultural land can be rezoned by municipal councils to non-agricultural uses.

It therefore seems reasonable from the perspective of prudent governance that all selected councils have communications with the provincial government which are in the public interest and, hence, in the public domain, about the data, evidence, and studies the provincial and municipal governments are using for decisions affecting agricultural land and non-agricultural land inventories. The non-sharing of those records for a research project which seeks to make a significant contribution to agricultural land

management and food security planning does not seem to serve any public interest purpose.

What we know from the previous case study, therefore, is that 19 municipal government councils were not forthcoming when asked about their communications with the provincial government or any other entities regarding data, evidence, and studies used by the Government of Ontario or by the councils in decisions that affect Ontario's agricultural land inventory.

In this case study test of the utility of the Universal Law of Location, the focus is solely on the municipal level of government.

The cover letter to councils follows, along with a letter to the editor ("Agriculture and food security", *Temiskaming Speaker*), and three survey forms which are designed to test whether the Universal Law of Location:

1. Contributes to upgrading municipal governments' data on the province's agricultural land inventory
2. Contributes to upgrading the evidence used by municipal governments to make decisions that affect the province's agricultural land inventory
3. Contributes to terms of reference for data-driven and evidence-based studies to upgrade municipal government decisions that affect the province's agricultural land inventory and its state of food security.

The same letter and attachments were sent to the council of each municipal government listed in Table 4. The communication to the council, City of Temiskaming Shores, is used for illustrative purposes. (5)

Exhibit1. Email to Council, City of Temiskaming Shores. Universal Law of Location Municipal Survey Re Agricultural Land Inventory, 2018-2025

From: wellar.barry@gmail.com <wellar.barry@gmail.com>

Sent: Thursday, March 13, 2025 8:27 PM

To: jtaylor@newmarket.ca

Subject: ULoL Municipal Survey Re Agricultural Land Inventory, 2018-2025

Dear Council,

The Information Research Board (IRB) project investigating the state of Ontario's agricultural land inventory is following the provincial study by a second study which involves municipal governments and, specifically, your municipal government along with

those identified in the first study. **The letter to the editor published in The Temiskaming Speaker which mentions the municipal government study is attached.**

In a previous communication from the Information Research Board (IRB) about its research program, you were invited to contribute to the agricultural land inventory case study investigating whether there is need to upgrade the data, evidence, or research studies used by the provincial government to inform its decisions which affect the state of Ontario's agricultural land inventory. The results of that research, including the text of emails to selected municipal governments and their responses, are in the report, [Applying Universal Law of Location as a Land Use Planning Decision Tool: Ontario Government Data, Evidence, and Research Studies Must be Upgraded to Enable Informed Decisions that Best Use and Preserve the Province's Threatened Farmland Inventory](#).

Our situational finding is that more than 800,000 acres of agricultural land have been converted to non-agricultural uses since the Doug Ford-led PC party took office in 2018, and indications are that more than 150,000 acres could follow suit in 2025.

We believe that those are alarming numbers which point to an urgent need to drastically improve how decisions are made by both provincial and municipal governments regarding Ontario's agricultural land inventory.

After extensive consultations, the IRB derived three appendices which ask the councils of 19 selected municipal governments to inform provincial agencies and politicians, other municipal governments and politicians, citizens, and the media as follows:

1. Appendix A. The number of acres of class 1 to class 7 agricultural land lost during the years 2018-2024 inclusive and projected to be lost in 2025.
2. Appendix B. The links and references to productions that identify the evidence used in council decisions 2018-2024 inclusive which affected their government's agricultural land inventories, and the evidence-related productions used, or which could be used in 2025.
3. Appendix C. The links and references to productions that identify the studies used in council decisions 2018-2024 inclusive which affected their government's agricultural land inventories, and the studies-related productions used, or which could be used in 2025.

The forms for appendices A, B, and C are attached.

It is our expectation that data, evidence, and studies pertaining to the agricultural land inventory files is a staple of every municipal government in Ontario that has an Official Plan. And it is our further expectation that the requested materials are already a matter of record, and completing the appendices should be a relatively straightforward task.

Council, I trust you will agree with IRB that this research is critically important for a number of socioeconomic and well-being reasons, and that it has become even more important due to the existential threats to Canadians' security, including their food security, because of the chaotic and often bizarre state of political affairs in the United States.

In view of the tariff/trade circumstance, impending agricultural land policy and planning decisions of the "new" provincial government, and the schedule for completing IRB research projects, the due date for receipt of materials for inclusion in the municipal agricultural land inventory case study report is April 16, 2025.

The expected completion date for the case study report is on or before April 30. You will be informed when the report is posted at

<https://wellar.ca/informationresearch/Publications.html>

Thank you.

Barry Wellar

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Exhibit 2 is a letter to the editor, **Temiskaming Speaker**, which is included in the communication to all councils. I am a former resident of the Little Clay Belt agricultural region, and I have a special interest in the disposition of the attachments by the council of Temiskaming Shores. **(6)**

Exhibit 2. Letter to the Editor, *Temiskaming Speaker*, “Agricultural Land and Food Security”, March 5, 2025, Page A5

LETTER TO THE EDITOR

“Agricultural Land and Food Security”

Dear editor,

The re-election of MPP John Vanthof is good news for people across Ontario who care about agricultural land and food security.

In his role last term as Agriculture Critic for the New Democrats, Mr. Vanthof made a significant contribution to the Information Research Board investigation into the reasons why more than 800,000 acres of high-quality farmland have been destroyed in Ontario since Doug Ford's PC party took office in 2018, and why more than 150,000 acres are likely to be destroyed in 2025.

Further, to make matters worse, while Doug Ford pushes to have more land rezoned from agricultural to non-agricultural use and puts Ontario's food security at risk, he seems to have no awareness that muddled Donald Trump could cut off food supplies from the U.S. if he thought food shortages might squeeze Canada to make trade deals on his erratic, bully-boy terms.

From a public service research perspective, it is disheartening to encounter Ontario politicians in power who lack respect for the principles of transparency and accountability at any time, but especially when the matter at issue is the province's inventory of farmland that provides food, which is a necessity of life.

Fortunately, Mr. Vanthof provides encouragement to deal with the cone of silence that the Board faces when trying to gain access to data, evidence, or research studies behind provincial government decisions to destroy farmland.

The next phase of this project asks the City of Temiskaming Shores council along with 24 (7) other selected municipal councils about actions taken from 2018-2025 to protect and preserve agricultural land in their municipalities. It is the Board's hope that we can again engage with MPP Vanthof when we examine the results of that survey.

Dr. Barry Wellar, C.M. (Formerly of Latchford) Professor Emeritus, University of Ottawa, President, Information Research Board

There are three forms in this test, one for each of data, evidence, and research studies. Exhibit 3 identifies the suite of appendices contained in the communication to the 19 councils.

Exhibit 3. Appendices for Survey of Selected Municipal Governments Regarding Their Experience with Agricultural Land Inventory Change Data, Evidence, and Research Studies, 2018-2025

Applying Universal Law of Location as a Land Use Planning Decision Tool:
Forms for Survey of Selected Municipal Councils Describing Data, Evidence, and Research Studies Contributing to Decisions that Affect Ontario's Agricultural Land Inventory, 2018-2025.

APPENDICES

There are three forms to the survey of the 19 municipal government councils selected for this test of the utility of the Universal Law of Location as a land use planning decision tool. ([Applying Universal Law of Location as a Land Use Planning Decision Tool: Ontario Government Data, Evidence, and Research Studies Must be Upgraded to Enable Informed Decisions that Best Use and Preserve the Province's Threatened Farmland Inventory](#))

APPENDIX 1. UNIVERSAL LAW OF LOCATION TEST 4A. MUNICIPAL GOVERNMENT AGRICULTURAL LAND INVENTORY DATA, 2018-2025 INCLUSIVE

APPENDIX 2. UNIVERSAL LAW OF LOCATION TEST 4B. MUNICIPAL GOVERNMENT AGRICULTURAL LAND INVENTORY EVIDENCE, 2018-2025 INCLUSIVE

APPENDIX 3. UNIVERSAL LAW OF LOCATION TEST 4C, AGRICULTURAL LAND INVENTORY: MUNICIPAL GOVERNMENT INVENTORY RESEARCH STUDIES, 2018-2025 INCLUSIVE

The next three sections (E, F, and G) discuss the forms sent to councils.

E. Data Form Sent to Councils

Exhibit 4 contains the form designed to capture:

1. Data on the change in the agricultural land inventory 2018-2024 by land class for each of the 19 municipal governments.

2. The types of non-agricultural uses which replaced agriculture.

A separate form is provided for each year, that is 2018, 2019, 2020, 2021, 2022, 2023, and 2024.

While the data form is for the timeframe 2018-2024, the study timeframe is 2018-2025, and an added data form for 2025 is invited from councils. The Town of Newmarket is named for illustrative purposes.

Exhibit 4. APPENDIX 1. UNIVERSAL LAW OF LOCATION TEST 4A

Municipal Government Agricultural Land Inventory Data, 2018-2025

Municipal Government: Town of Newmarket

Year: 2018

Land Class	# of Acres Year Start - 01/01	# of Acres Year End - 31/12	# of Acres Lost in 2018 *
1			
2			
3			
4			
5			
6			
7			
Total			

* Non-agriculture land use(s) that replaced agriculture

Class 1:

Class 2:

Class 3:

Class 4:

Class 5:

Class 6:

Class 7:

The importance of the data section to this case study cannot be overstated.

Data about the state of Ontario's agricultural land inventory are the basis of evidence about the current state of that inventory, which is the basis of informed decisions about the future state of that inventory in time and space.

As a result, a critical first step in the decision process is identifying the data variables from which critical evidence can be derived for consideration by municipal councils as the basis of informed decisions about the near-term, medium-term, and long-term status of every class of land comprising Ontario's agricultural land inventory.

The data variables pertinent to this investigation should have been readily available on Ontario government websites, but my searches did not yield such a list.

Further, if there is such a list, the link to the production containing the list should have been sent to me as a relevant and useful response to the communications sent to Minister Rob Flack (Agriculture, Food, and Agribusiness) and Minister Lisa Thompson (Rural Affairs). [Applying Universal Law of Location as a Land Use Planning Decision Tool: Ontario Government Data, Evidence, and Research Studies Must be Upgraded to Enable Informed Decisions that Best Use and Preserve the Province's Threatened Farmland Inventory.](#)

However, instead of receiving replies dealing with data (as well as evidence and research studies), what I received were two identical emails referring me to the freedom of information route, which is an obvious off-ramp to nowhere in this case since the communications to Ministers Flack and Thompson did not ask for information. **(8)**

Given the non-assistance of provincial agencies, the following literatures were searched for contributions to a first approximation of a core set of variables for the communication to councils.

- All the productions cited in the previous report regarding Ontario's agricultural land inventory. [Applying Universal Law of Location as a Land Use Planning Decision Tool: Ontario Government Data, Evidence, and Research Studies Must be Upgraded to Enable Informed Decisions that Best Use and Preserve the Province's Threatened Farmland Inventory.](#)
- Other provincial government documents, including productions of Agriculture, Food, and Agribusiness; Economic Development; Environment; Municipal Affairs and Housing; and Rural Affairs.
- Municipal government documents including Official Plans for township, town, city, region, and county governments.

- Productions of professional organizations such as the Ontario Professional Planners Institute and Canadian Institute of Planners.
- Productions of advocacy organizations such as Ontario Farmland Trust, Ontario Association of Agricultural Societies, Farm & Food Care Ontario, Ontario Federation of Agriculture, Ontario Soil and Crop Improvement Association, and Agricultural Adaptation Council.
- Productions of broadcast media channels such as those represented in Table 2, [Applying Universal Law of Location as a Land Use Planning Decision Tool: Ontario Government Data, Evidence, and Research Studies Must be Upgraded to Enable Informed Decisions that Best Use and Preserve the Province's Threatened Farmland Inventory](#).

In addition to literature searches, suggestions were solicited from elected and appointed municipal government officials, as well as from spatial and non-spatial municipal database development professionals, including GISPs.

Synthesis of inputs from those sources identified core variables for a first approximation to be:

1. "Agricultural land class from 1 to 7".
2. "Agricultural land acreage lost by land class on an annual basis".
3. "Non-agricultural use displacing agricultural use by land class on an annual basis".

The appropriate timeframe to conduct robust land use change analysis is far from the "one timeframe fits all" variety.

There are seven land use classes, and there are many variations in the pressures to convert agricultural lands to non-agricultural uses depending upon the location of the areas under pressure.

As a result, some land use classes within, adjacent to, and proximal to municipal boundaries undergo observably significant changes on an annual basis, and for others the changes may be observably significant over a half-decade, or a decade or longer. The challenges of pattern and trend detection will likely vary accordingly.

However, for comparative analysis purposes, and the purposes of a first approximation case study, the time in office of the Ford government (2018-2025) is deemed more likely to receive responses from municipal governments if they have these data on file.

And, of course, if the data are not on file that should be relatively easy to confirm for just eight years, and councils can respond accordingly.

The next several pages discuss the data component from the perspective of how the response from councils contributes to assessing the utility of the Universal Law of Location as an agricultural land planning and decision tool.

First, agricultural land in classes 1, 2, and 3 in some locations, class 4 in some locations, and class 5 in some locations is a highly valuable, irreplaceable social and economic asset. and classes 6 and 7 are seen to have considerable upside potential due to climate change and soil and crop improvements. **(9)**

That assessment suggests there is reason to expect that municipal governments must have such records on file and, if that is not the case then it should be.

Second, there is the matter of councils' regard for the highest and best use principle as it applies to land use plans and zoning by-laws.

In brief, this principle means that for a given parcel of land, or site, among all the land use classifications which a municipality has, one classification ranks higher than all the others, and within that that classification one sub-classification use is better than all the others.

And it also means that a municipality has criteria in place to govern how designations are made.

As an example, housing could be deemed highest use, and a combination of low-rise mixed market value and affordable could be deemed best use, with a schedule of criteria to support the designation.

Or, in a particular location commercial could be deemed highest use, and a mini mall could be deemed best use.

In this case study, we proceed with an abundance of caution in respect of food security concerns, and that brings into play the Precautionary Principle to complement the highest and best use principle.

That is, unless data exist that Ontario has sufficient amounts of all classes of agricultural land (class 1, class 2, class 3, class 4, class 5, class 6, and class 7) for as long as they will be needed, and where they will be needed, then prudent decision-making dictates that new non-agricultural uses of land be located on land currently occupied by non-agricultural uses, and includes both developed and undeveloped non-agricultural land.

Third, councils' responses call into play the zero-sum rule.

That is, something is already everywhere, and if new, non-agricultural land use developments are not located on agricultural land then they must be located on land currently occupied by non-agricultural land uses.

An illustration of this zero-sum reality of land use is provided by an Ottawa Citizen article, "Offices offer one housing solution", Ottawa Citizen, March 29, 2025. p.A2, about the pros and cons of converting federal office buildings to housing (<https://tinyurl.com/3hksdcat>).

As dictated by the zero-sum rule, if the amount of undeveloped land for housing decreases over time and space, and there is no other land option, such as rezoning agricultural land, then currently developed land, such as that containing federal office buildings, or warehouses, or golf courses, or retail structures, or roads, or parking structures, etc., must be converted to housing.

And that lack of regard for zero-sum limits to land for building new housing is perpetuated just two weeks later by two more editorial page feature articles in the Ottawa Citizen dated April 10: "Housing projects require quicker approval" (<https://tinyurl.com/c5hud3nw>), and "Building heights for new housing must be uniform – Differing rules will hurt city's growth" (<https://tinyurl.com/4swnmjbc>).

There is no mention of land, not a word, in three articles about how lack of available, undeveloped land affects the pros and cons of the possible offices-to-housing-units narrative, or about how building heights affect the amount of land required for multiple-unit structures, or about how quick approvals require land being available on developed and/or undeveloped land for housing to be built.

Which brings to mind an observation by the Canadian band *BTO* which is increasingly pertinent to the land use planning future for municipal councils. (<https://youtu.be/w3fRBzRngdc>)

In brief, and in the spirit of *BTO*'s iconic "You ain't seen nothing yet", Ontario is now well into harder decision time that comes with decreasing amounts of readily available undeveloped land for non-agricultural uses.

This project is a heads-up that harder decision time is here, and land use choices will get more and more consequential as the non-developed land component of the province's land inventory decreases month by month in many Ontario municipalities.

Examination of the responses by municipal government councils to the data form are presented in Appendix 1.

F. Evidence Form Sent to Councils

Exhibit 5 contains the form designed to capture:

1. Links to provincial government statements, external and internal research studies, consultations, expert testimony, vested interest submissions, consultant submissions, staff reports and other productions including geospatial mapping system outputs which affected decisions to change or not change the municipal government's agricultural land inventory.
2. Links to provincial government statements, external and internal research studies, consultations, expert testimony, vested interest submissions, consultant submissions, staff reports and other productions including geospatial mapping system outputs which affected decisions to change or not change the municipal government's agricultural land inventory.

A separate form is sent for each year, that is 2018, 2019, 2020, 2021, 2022, 2023, 2024, and 2025. The Town of Newmarket is named for illustrative purposes.

Exhibit 5. APPENDIX 2. UNIVERSAL LAW OF LOCATION TEST 4B

Municipal Government Agricultural Land Inventory Evidence, 2018-2025

Municipal Government: Town of Newmarket

Year: 2018

A. Links to provincial government statements, external and internal research studies, consultations, expert testimony, vested interest submissions, consultant submissions, staff reports and other productions including geospatial mapping system outputs which affected decisions to change or not change the municipal government's agricultural land inventory.

B. References for analog or non-digital provincial government statements, external and internal research studies, consultations, expert testimony, vested interest submissions, consultant submissions, staff reports, and other productions including analog or non-digital maps which affected decisions to change or not change the municipal government's agricultural land inventory.

The importance of the evidence section to this case study cannot be overstated. As a result, it is prudent to ensure that the meaning attached to the word “evidence” is clear and is substantively sound.

First, it is appropriate to acknowledge the five widely accepted or proclaimed ways of knowing in which claims about “evidence” are expressed:

1. Authority
2. Everyday experience or, in more popular terms, common sense
3. Intuition
4. Revelation
5. Science

Those ways of knowing are discussed in detail in a previous Information Research Board Report, and readers are referred to that production for an in-depth examination of each way of knowing. See [DOES DONALD TRUMP HAVE THE KNOW-HOW TO SAVE THE U.S.A.?](#)

Although the term “evidence” is used in claims about all those ways of knowing, only the scientific way of knowing is applicable to Information Research Board studies, and the other four are rejected. Reasons for their rejection include:

- Scientific ways of knowing must be transparent: that condition does not apply to other ways of knowing.
- Scientific ways of knowing must be evaluable by external examiners: that condition does not apply to other ways of knowing.
- Scientific ways of knowing must be repeatable: that condition does not apply to other ways of knowing.
- Scientific ways of knowing must allow testing for reproducibility of results: that condition does not apply to other ways of knowing.
- Scientific ways of knowing must rigorously investigate alternative explanations: that condition does not apply to other ways of knowing.

- Scientific ways of knowing must allow for counter-analysis: that condition does not apply to other ways of knowing.
- Scientific ways of knowing must be verifiable: that condition does not apply to other ways of knowing.
- Outcomes of scientific inquiries must be subject to validation: outcomes of other ways of knowing cannot be empirically validated.
- Scientific ways of knowing must take into account unseens and unknowns: that condition does not apply to other ways of knowing.
- Scientific ways of knowing must be based on specifying and investigating relationships among variables: that condition does not apply to other ways of knowing.
- Scientific ways of knowing must enable generalizing from a sample to a population within known limits of confidence: that condition does not apply to other ways of knowing.
- Scientific ways of knowing must be based on methodological design: that condition does not apply to other ways of knowing.
- Documentation of evidence produced by scientific ways of knowing must include all meta-data or meta-information or meta-knowledge needed for counter-evidence investigation purposes: that condition does not apply to other ways of knowing.

As a result, when this report refers to evidence, it is referring only to findings, results, outcomes, claims, contentions, etc., which are produced by scientifically based methods and techniques of analysis and synthesis.

The overriding reason for adopting the scientific approach and rejecting the others, therefore, is that evidence derived by scientific means passes methodologically based tests such as those designed to measure whether statements are accurate, actionable, certifiable, confirmable, corroborative, duplicative, evaluable, relevant, reliable, repeatable, representative, reproducible, testable, transparent, valid, and verifiable. **(10)**

Second, research methods and techniques and scenarios that produce evidence derived by methodologically designed means exist in science, but not in any of the other ways of knowing.

Examples of research methods, and techniques used to produce methodologically derived evidence pertinent to agricultural land use planning decisions are shown in Table 3.

Table 3. Examples of Methods, Techniques, and Scenarios Found in Government, Advocacy Group, Professional Association, Academic, and Consultant Reports on Agricultural Land Research

Attitudinal surveys	Multidimensional scaling
Change detection	Multivariate analysis
Change analysis	Normative Delphi
Charrettes	Operations research
Comparative analysis	Optimization
Content analysis	Overlay analysis
Cost-benefit analysis	Panel evaluation
Cost-effectiveness analysis	Pattern analysis
Cross-impact analysis	Policy Delphi
Diminishing returns analysis	Rate of return analysis
Doomsday mapping	Referenda
Econometric analysis	Risk analysis
Environmental scans	Roundtables
Factor analysis	Simulation
Focus groups	Spatial analysis
Forecasting Delphi	Statistical analysis (descriptive)
Geospatial analysis	Statistical analysis (inferential)
Geostatistical analysis	Statistical analysis (parametric)
Impact assessment	Stewardship mapping
Indexing	Surveys
Input-output analysis	Systems analysis
Life-cycle analysis	Time series analysis
Market analysis	Trend analysis
Modelling	

As noted, Table 3 contains examples of the evidence-generating research methods, techniques, and scenarios in the learned, professional, technical, public interest group,

as well as broadcast and social media literatures on agricultural land use planning and decision-making.

It appears fair to state that Table 3 affirms there is a robust body of research methods, techniques, and scenarios available to produce substantive evidence upon which to base decisions that affect agricultural land inventories in general.

Further, the extensive list of research methods, techniques and scenarios identified in Table 3 establishes that it is reasonable to expect that all 19 municipal councils have access to productions and links to productions containing research methods, techniques, and scenarios used to generate evidence for land use planning and decision-making purposes.

Finally, before presenting the evidence-related forms sent to councils, it is important to emphasize that all the methods, techniques and scenarios listed in Table 3 can incorporate locational variables.

That is, the methods, techniques and scenarios can be location-based in geographic units defined by coordinates as well as by geometric units such as points, lines, and polygons.

And, they can also be classified in terms of administrative units such as villages, towns, townships, cities, counties, and regions.

The survey form sent to 19 councils is designed to ascertain the methods, techniques, and scenarios used by municipal councils to produce evidence which directs decisions that affect the agricultural land inventories within, adjacent to, and proximal to their municipal boundaries.

Table 3 therefore serves as context for the evidence form.

Examination of the responses by municipal government councils to the evidence form are presented in Appendix 2.

G. Research Studies Form Sent to Councils

Exhibit 6 contains the form designed to capture:

1. Links to external and internal research studies which affected decisions to change or not change the municipal government's agricultural land inventory.

2. References for external and internal research studies which affected decisions to change or not change the municipal government's agricultural land inventory.

A separate form is sent for each year, that is 2018, 2019, 2020, 2021, 2022, 2023, 2024, and 2025. The Town of Newmarket is named for illustrative purposes.

Exhibit 6. APPENDIX 3. UNIVERSAL LAW OF LOCATION TEST 4C

Agricultural Land Inventory: Municipal Government Inventory Research Studies, 2018-2025

Municipal Government: Town of Newmarket

Year: 2018

A. Links to external and internal research studies which affected decisions to change or not change the municipal government's agricultural land inventory.

B. References for external and internal research studies which affected decisions to change or not change the municipal government's agricultural land inventory.

For this section it is appropriate to recall the phrase "municipal governments are creatures of the province", and the downsides that are associated with failures of the province to properly oversee its municipal affairs obligations.

There are 444 municipal governments in the province of Ontario, and a panel of those active in the agricultural land domain estimate that for more than 150 municipalities, land zoned "agricultural" lies within, adjacent to, or proximal to their boundaries.

It therefore appears reasonable to expect that the provincial government has an active research program designed to protect and preserve Ontario's agricultural land inventory within, adjacent to, and proximal to their boundaries.

However, Table 6 in the previous report ([Applying Universal Law of Location as a Land Use Planning Decision Tool: Ontario Government Data, Evidence, and Research](#))

[Studies Must be Upgraded to Enable Informed Decisions that Best Use and Preserve the Province's Threatened Farmland Inventory](#)) found that application of the Universal Law of Location revealed a major need for the provincial government to upgrade the quantity and quality of research studies undertaken to preserve and protect Ontario's agricultural land inventory.

"Difficulties also arose when searching provincial records for research studies undertaken over the past 75 years that dealt with problems, issues, concerns, etc., that were or could be associated with the Law of Universal Location.

That is, since something is everywhere, the question arises:

What research studies have been undertaken to ensure the soundness of decisions to remove agricultural land uses from agricultural lands and replace them with non-agricultural uses?

There could be such materials in the files, but I did not find them after numerous searches. As a result, the materials in Table 6 are referred to as a first estimation, which can be revised in part or whole if corrective responses are received from the Ministry of Agriculture, Food, and Agribusiness or the Ministry of Rural Affairs."

Further, due to the perception that municipalities are "creatures of the province", some of the entries in Table 6 explicitly incorporate municipal governments and others implicitly incorporate municipal governments in the terms of reference proposed for studies by the provincial government.

That is, the provincial government puts very few non-ceremonial "shovels in the ground" on any matter, and in the case of planning and zoning of agricultural and non-agricultural uses of agricultural land, it delegates the "heavy lifting" to municipal governments. Table 6 in the prior report is therefore included here labelled as Table 4, and the studies which directly involve municipal governments are highlighted in green.

It appears reasonable to posit that the highlighted studies to be done by the province could involve municipal governments as study participants, and/or test sites, and/or research sponsors. And should active municipal engagement be precluded by the provincial government, then municipal governments will become involved as affected parties.

Those studies are therefore among the initial set of studies proposed to upgrade the body of studies undertaken by municipal governments to preserve and protect their respective components of the provincial agricultural land inventory.

Table 4. Needed Research Study Upgrades Identified as a Result of Applying the Universal Law of Location to Municipal Governments' Current Body of Data and Evidence Used to Make Decisions that Affect Ontario's Agricultural Land Inventory

Study 1. Review of all current policy, plan, program, and operations productions for inclusion of the zero-sum constraint condition on conversion of agricultural land to non-agricultural land uses.

Study 2. Review of all current policy, plan, program, and operations productions for inclusion of the zero-sum constraint condition on conversion of agricultural land to municipal boundary expansion land.

Study 3. Geo-based report on the state of Ontario's food self-sufficiency.

Study 4. Geo-based report on the state of Ontario's food insecurity.

Study 5. Investigating the impact of climate change on crops and yields of agricultural land classes 1, 2, 3, 4, 5, 6, and 7 at 5-year intervals.

Study 6. Designing GIS applications which rank non-agricultural land uses from highest and best to lowest and worst for development approvals for agricultural land classes 1, 2, 3 and 4.

Study 7. Empirically testing study 6 by examining practices of affected municipalities, counties, districts, and regions, as well as Government of Ontario, 2018-2024.

Study 8. Literature search and review of theoretical research on upgrading agricultural land classes 4, 3, and 2 to agricultural land classes 3, 2, and 1 respectively.

Study 9. Literature search and review of applied research on upgrading agricultural land classes 4, 3, and 2 to agricultural land classes 3, 2, and 1 respectively.

Study 10. Literature search and review of theoretical research on converting non-agricultural land uses to class 1, class 2, class 3, and class 4 agricultural land as a means of increasing the provincial inventory of agricultural land classes 1, 2, 3, and 4.

Table 4. Needed Research Study Upgrades Identified as a Result of Applying the Universal Law of Location to Municipal Governments' Current Body of Data and Evidence Used to Make Decisions that Affect Ontario's Agricultural Land Inventory (Continued)

Study 11. Literature search and review of applied research on converting non-agricultural land uses to class 1, class 2, class 3, and class 4 agricultural land as a means of increasing the provincial inventory of agricultural land classes 1, 2, 3, and 4.

Study 12. Upon completion and expert review of study 7, map non-agricultural lands with potential for increasing the provincial inventory of class 1, class 2, class 3, and class 4 agricultural land.

Study 13. Design of a comprehensive, impact assessment gate-keeper procedure to precede decisions about allowing non-agricultural uses of land on agricultural land.

Study 14. Design of a protocol which incorporates the zero-sum condition into analysis of all Ontario government proposals to locate non-agricultural land uses under, on, or above agricultural lands.

Study 15. Methodologically designed handbook of rules for choosing between agricultural use and non-agricultural use of class 1, class 2, class 3, class 4, class 5, class 6, and class 7 agricultural land.

It is emphasized that the studies listed in Table 4 are specific to testing the utility of the Universal Law of Location as an agricultural land use planning decision tool. In this case the focus is on research studies found to be necessary to better use and preserve Ontario's agricultural land inventory located within, adjacent to, and proximal to municipal boundaries.

For the second set of proposed studies, we return to the discussions about data and evidence in sections E and F, respectively.

The variables in section E suggest many kinds of studies, and no doubt municipal governments can conduct studies dedicated to those variables or add them to the data sets used for studies in progress and on their research agenda.

As for studies in the evidence domain, more than 40 methods, techniques, and scenarios used in agricultural land research are presented in Table 3.

While a survey of municipalities might provide a definitive proportion, the literature suggests that many municipal governments in Ontario have not used most of the methods, techniques, and scenarios listed in Table 3 in helping them make decisions about protecting and preserving agricultural land.

Finally, the methods, techniques, and scenarios listed in Table 3 are a first approximation, and more intense literature searches would no doubt identify numerous additions to municipal governments' tool kits. Of particular interest in this regard are geodata and geoinformation mapping, analysis, and synthesis methods and techniques.

Examination of the responses by municipal government councils to the research studies form are presented in Appendix 2.

H. Communications Received and Not Received from Municipal Councils Contacted in Section D, Table 2

By means of elections, code of conduct rules, provincial regulations, and civil and criminal legal actions, municipal politicians can be held to transparency and accountability standards by citizens. As a result, it is appropriate that municipal councils have their responses to this public service investigation published in a report which asks them to respond to questions that fall within the purview of municipal councils.

Further in the interests of transparency and accountability, citizens are entitled to be informed about which municipal councils did and did not respond to reasonable, pertinent questions on matters of public interest. **(11)**

The remainder of Part H summarizes the responses in appendices 1, 2, and 3 to the survey which asks 19 municipal councils about their experience with agricultural land change data, evidence, and research studies, 2018-2025.

1. Responses by Municipal Councils to Data Component of Survey on Changes Affecting Ontario's Agricultural Land Inventory, 2018-2025

As shown in APPENDIX 1. UNIVERSAL LAW OF LOCATION TEST 4A. MUNICIPAL GOVERNMENT AGRICULTURAL LAND INVENTORY DATA, 2018-2025 INCLUSIVE, no response was received from any of the 19 municipal councils.

That is, none of the 19 municipal councils responded to basic data questions regarding:

1. Data on the change in a municipality's agricultural land inventory 2018-2024 by land class.
2. The types of non-agricultural uses which replaced agriculture.

2. Responses by Municipal Councils to Evidence Component of Survey on Changes Affecting Ontario's Agricultural Land Inventory, 2018-2025

As shown in APPENDIX 2. UNIVERSAL LAW OF LOCATION TEST 4B. MUNICIPAL GOVERNMENT AGRICULTURAL LAND INVENTORY EVIDENCE, 2018-2025 INCLUSIVE, no response was received from any of the 19 municipal councils regarding basic questions about sources of evidence used in making decisions affecting their municipal agricultural land inventory, 2018-2025.

That is, none of the 19 municipal councils responded to the evidence component of the survey regarding:

- A.** Links to provincial government statements, external and internal research studies, consultations, expert testimony, vested interest submissions, consultant submissions, staff reports and other productions including geospatial mapping system outputs which affected decisions to change or not change the municipal government's agricultural land inventory.
- B.** References for analog or non-digital provincial government statements, external and internal research studies, consultations, expert testimony, vested interest submissions, consultant submissions, staff reports, and other productions including analog or non-digital maps which affected decisions to change or not change the municipal government's agricultural land inventory.

3. Responses by Municipal Councils to Research Studies Component of Survey on Changes Affecting Ontario's Agricultural Land Inventory, 2018-2025

As shown in APPENDIX 3. UNIVERSAL LAW OF LOCATION TEST 4C, AGRICULTURAL LAND INVENTORY: MUNICIPAL GOVERNMENT INVENTORY RESEARCH STUDIES, 2018-2025 INCLUSIVE, no response was received from any of the 19 municipal councils regarding external and internal research studies used in making decisions affecting their municipal agricultural land inventory, 2018-2025.

That is, none of the 19 municipal councils responded to the external and internal research studies component of the survey regarding:

- A.** Links to external and internal research studies which affected decisions to change or not change the municipal government's agricultural land inventory.

B. References for external and internal research studies which affected decisions to change or not change the municipal government's agricultural land inventory.

Table 5 is a summary record of Appendix 1, Appendix 2, and Appendix 3 regarding the response by the contacted municipal councils to a survey about the data, evidence, and research studies used in decision making that affected their agricultural land inventories by class of land, 2018-2025.

Table 5. Record of Which Municipal Council Responded to a Survey about the Data, Evidence, and Research Studies Used in Decision Making that Affected Its Municipal Agricultural Land Inventory by Class of Land, 2018-2025

Municipal Government	Response to Survey Component about:					
	Data		Evidence		Research Studies	
	Yes	No	Yes	No	Yes	No
Bradford-West Gwillimbury (Town)		X		X		X
Brampton (City)		X		X		X
Brantford (City)		X		X		X
Cambridge (City)		X		X		X
Dufferin (County)		X		X		X
Grimsby (Town)		X		X		X
Guelph (City)		X		X		X
Halton (Region)		X		X		X
Hamilton (City)		X		X		X
London (City)		X		X		X
Markham (City)		X		X		X
Newmarket (Town)		X		X		X
Niagara (Region)		X		X		X
Ottawa (City)		X		X		X
Peterborough (City)		X		X		X
Temiskaming Shores (City)		X		X		X
Vaughan (City)		X		X		X
Wellington (County)		X		X		X
Wilmot (Township)		X		X		X
Total	0	19	0	19	0	19

I. Interpretation of Results from the Municipal Council Survey Based on the Precautionary Principle

The total absence of responses by 19 municipal councils is taken as a message to proceed with an abundance of caution when interpreting that result.

Or, to re-phrase, given the significance attached to the destruction of agricultural land in this research, and primarily to the destruction of classes 1, 2, 3, secondarily classes 4 and 5, and tertiarily classes 6 and 7, the Precautionary Principle dictates that no benefit of doubt be accorded in any way, shape, or form to the non-responses by councils to a survey regarding data, evidence, and research studies underlying decisions to change the agricultural land acreages within, adjacent to, and proximal to their municipal boundaries, 2018-2025. **(12)**

The following interpretive comments about the total lack of responses regarding data, evidence, and research studies used by councils in decisions affecting agricultural land inventories, 2018-2025 are therefore presented with all due regard for the Precautionary Principle.

1. Data reporting on how much acreage of which classes of agricultural land are lost annually 2018-2025 appear to be among the most basic and most obvious of variables to include in municipal council deliberations regarding agricultural land changes within, adjacent to, or proximal to the municipal boundaries of the subject councils.

The apparent absence of those data in any of the 19 municipal databases points to extremely limited to non-existent bodies of data upon which any of the subject municipal councils base decisions affecting their agricultural land inventories.

2. Data reporting on which non-agricultural uses are replacing use of land for agricultural purposes annually, 2018-2025, appear to be among the most basic and most obvious of variables to include in municipal council deliberations regarding agricultural land changes within, adjacent to, or proximal to the municipal boundaries of the subject councils.

The apparent absence of those basic data in any of the 19 municipal databases points to extremely limited bodies of data upon which the municipal councils base decisions affecting their agricultural land inventories.

3. There are few *de novo* decisions made by any municipal council in Ontario regarding agricultural land issues, problems, concerns, challenges, opportunities, etc., and it is reasonable to expect that every municipal council selected for this survey has an e-library of links to productions which have already applied one or more research methods

or techniques in the production of evidence pertinent to all decision matters before councils.

The apparent absence of links much less readily accessed e-libraries of links points to extremely limited bodies of evidence upon which municipal councils base decisions affecting their agricultural land inventories.

4. There are few *de novo* decisions made by any municipal council in Ontario regarding agricultural land issues, problems, concerns, challenges, opportunities, etc., and it is reasonable to expect that every municipal council selected for this survey has a file of references for productions which have already applied one or more research methods or techniques in the production of evidence pertinent to all decision matters before councils.

The apparent absence of references to expert productions much less readily accessed e-libraries of references points to extremely limited bodies of evidence upon which municipal councils base decisions affecting their agricultural land inventories.

5. There are few *de novo* decisions made by any municipal council in Ontario regarding agricultural land issues, problems, concerns, challenges, opportunities, etc., and it is reasonable to expect that every municipal council selected for this survey has an e-library of links to external and internal research studies which have already investigated data and/or evidence applied one or more research methods or techniques in the production of evidence pertinent to all decision matters before councils.

The apparent absence of links much less readily accessed e-libraries of links to research studies points to extremely limited bodies of data and/or empirical evidence upon which municipal councils base decisions affecting their agricultural land inventories.

6. There are few *de novo* decisions made by any municipal council in Ontario regarding agricultural land issues, problems, concerns, challenges, opportunities, etc., and it is reasonable to expect that every municipal council selected for this survey has a file of references to external and internal research studies which have already investigated data and/or evidence applied one or more research methods or techniques in the production of evidence pertinent to all decision matters before councils.

The apparent absence of links much less readily accessed e-libraries of links to research studies points to extremely limited bodies of data and/or empirical evidence upon which municipal councils base decisions affecting their agricultural land inventories.

Finally, there are many bottom lines to be derived from points 1 to 6 above, but one of special importance at this time applies to the previous study and to this one, and that is the matter of provincial government and municipal government complicity in the destruction of agricultural land in Ontario. (13)

The previous study concluded that the provincial government bore some and perhaps all responsibility in the final analysis for the destruction of agricultural land in Ontario, 2018-2025.

This study concludes that, based on the non-responses from 19 surveyed municipalities, some to many of Ontario's 444 municipalities could also be complicit to some degree in the destruction of Ontario's agricultural land inventory, 2018-2025, and post-2025 as well.

J. Assessing the Utility of the Universal Law of Location as a Land Use Planning and Decision Tool for Evaluating Municipal Council Statements About the State of Ontario's Agricultural Land Inventory

There are three general tests for assessing the utility of the Universal Law of Location as an agricultural land inventory decision tool. That is, whether the Law:

- Contributes to upgrading municipal government data on the province's agricultural land inventory.
- Contributes to upgrading the evidence used by municipal governments to make decisions that affect the province's agricultural land inventory.
- Contributes to terms of reference for data-driven and evidence-based studies to upgrade municipal government decisions that affect the province's the province's agricultural land inventory and its state of food security.

The Universal Law of Location is briefly recalled, and then its utility as a tool to upgrade the data, evidence, and research studies used by municipal governments in making decisions that affect Ontario's agricultural land inventory is assessed.

1. Universal Law of Location Reviewed

The Universal Law of Location states that something is everywhere under, on, and above the Earth's surface. ([Universal Law of Location Supported by GIS as a Best Practice Element in Land Use Planning and Transportation Planning Decision Systems](#))

One message of this law is that if governments, corporations, individuals, or other enterprises locate non-agricultural, physical entities on, under, or above the surface of agricultural land, the Ontario agricultural land inventory is affected.

As established by dozens of productions cited in [Applying Universal Law of Location as a Land Use Planning Decision Tool: Ontario Government Data, Evidence, and Research Studies Must be Upgraded to Enable Informed Decisions that Best Use and Preserve the Province's Threatened Farmland Inventory](#), the effects of locating non-agricultural entities on, under, above, or overly proximal to the surface of agricultural land include physical loss of agricultural land acreage, the need to change farming practices, as well as soil quality loss and loss of productivity of agricultural land acreage.

The bottom line, therefore, is that costly losses in the food security chain are incurred when policy, planning and zoning decisions locate non-agricultural uses under, on, above, or overly proximal to agricultural lands. The preceding study found an urgent need to upgrade the quality of data, evidence, and research studies used by the provincial government to protect and preserve Ontario's agricultural land inventory.

In addition, however, many productions point out that the provincial government was not and is not solely to blame for the loss of agricultural land. That is, municipal councils also make decisions which negatively affect the state of agricultural lands within, adjacent to, and proximal to their boundaries, and questions therefore arise about the data, evidence, and research studies used to inform their decisions.

And that situation brings us back to the Universal Law of Location which informs municipal governments about the inevitable food-related losses which are in store when agricultural land is destroyed to accommodate non-agricultural uses.

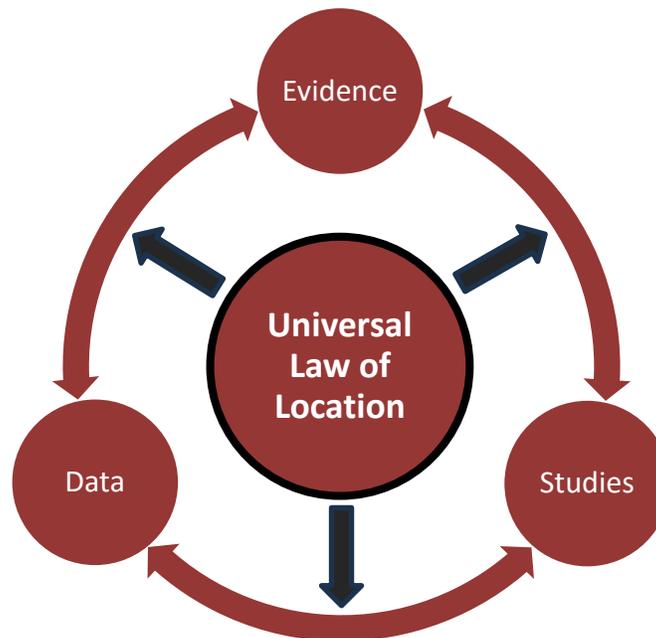
The next three sections examine the responses by municipal councils to the survey forms sent to them on or about March 13, 2025, and consider whether higher regard for the Universal Law of Location might have contributed to better data, better evidence, better research studies and, consequently, better decisions which better preserve and protect Ontario's agricultural land inventory.

The final review comment addresses the matter of representing relationships among the Universal Law of Location, data, evidence, and data-driven and evidence-based studies.

To this point in the ULoL project, text has been the communication means used to describe relationships among the Universal Law of Location, data, evidence, and data-driven and evidence-based studies.

In the spirit of the adage, “A picture is worth a thousand words”, Figure 1 provides a graphic context for the text discussion which follows. I hasten to add that Figure 1 is a source of dozens of relationships among the Universal Law of Location, data, evidence, and studies. A small selection of those relationships is discussed in this report.

Figure 1. Graphic Representation of Relationships Among Universal Law of Location, Data, Evidence, and Studies



K. Assessing the Utility of the Universal Law of Location as a Land Use Planning and Decision Tool for Evaluating Municipal Council Statements About the State of Ontario's Agricultural Land Inventory

There are three general tests for assessing the utility of the Universal Law of Location as an agricultural land inventory decision tool. That is, whether the Law:

- Contributes to upgrading municipal government data on the province's agricultural land inventory.
- Contributes to upgrading the evidence used by municipal governments to make decisions that affect the province's agricultural land inventory.
- Contributes to terms of reference for data-driven and evidence-based studies to upgrade municipal government decisions that affect the province's the province's agricultural land inventory and its state of food security.

The Universal Law of Location is briefly recalled, and then its utility as a tool to upgrade the data, evidence, and research studies used by municipal governments in making decisions that affect Ontario's agricultural land inventory is assessed.

1. Universal Law of Location Reviewed

The Universal Law of Location states that something is everywhere under, on, and above the Earth's surface. ([Universal Law of Location Supported by GIS as a Best Practice Element in Land Use Planning and Transportation Planning Decision Systems](#))

One message of this law is that if governments, corporations, individuals, or other enterprises locate non-agricultural, physical entities on, under, or above the surface of agricultural land, the Ontario agricultural land inventory is affected.

As dozens of productions cited in [Applying Universal Law of Location as a Land Use Planning Decision Tool: Ontario Government Data, Evidence, and Research Studies Must be Upgraded to Enable Informed Decisions that Best Use and Preserve the Province's Threatened Farmland Inventory](#) establish, the effects of locating non-agricultural entities on, under, or above overly proximal to the surface of agricultural land include physical loss of agricultural land acreage, the need to change farming practices, as well as soil quality loss and loss of productivity of agricultural land acreage.

The bottom line, therefore, is that costly losses in the food security chain are incurred when policy, planning and zoning decisions locate non-agricultural uses under, on, above, or overly proximal to agricultural lands. The preceding study found an urgent need to upgrade the quality of data, evidence, and research studies used by the provincial government to protect and preserve Ontario's agricultural land inventory.

In addition, however, many productions point out that the provincial government was not and is not solely to blame for the loss of agricultural land. That is, municipal councils also make decisions which negatively affect the state of agricultural lands within and proximal to their boundaries, and questions therefore arise about the data, evidence, and research studies used to inform their decisions.

And that situation brings us back to the Universal Law of Location which informs municipal governments about the inevitable food-related losses which are in store when agricultural land is destroyed to accommodate non-agricultural uses.

In the next three sections we examine the responses by municipal councils to the survey forms sent to them on or about March 13, 2025, and consider whether higher regard for the Universal Law of Location might have contributed to better data, better

evidence, better research studies and, consequently, better decisions which better preserve and protect Ontario's agricultural land inventory.

2. Utility of the Universal Law of Location as a Tool for Upgrading Data Describing Municipal Governments' Agricultural Land Inventories

The utility of the Universal Law of Location is confirmed by its contribution as a tool for upgrading data that describe municipal agricultural land inventories over time and space.

The Universal Law of Location which states that something is everywhere breaks new ground through its requirement that informed decisions about where and when to change agricultural land acreages must be based on data which fully describe and subscribe to zero-sum conditions.

Further in that same vein, the Universal Law of Location upgrades the decision-making process by informing council members that they must understand and respect the primary term of engagement: namely, data involving land acreages must satisfy the logic of the zero-sum condition.

That is, by way of brief illustration, an acre of land gained or lost for one land use is an acre lost or gained for another use, no exceptions.

Moreover, because there are limited amounts of class 1, class 2, and class 3 agricultural land, the Universal Law of Location informs that data quality must be such that municipal councils are fully apprised of class 1, 2, and 3 acreages in real time, and their forecasted acreages 5, 10, 25, and 50 and more years into the future to ensure food security in perpetuity.

In addition, the present focus on data describing changes in acreages by land class, and data on the shift from agriculture to non-agricultural use of agricultural land, is a fundamental contribution to specifying the database needed by councils to make decisions which ensure the agricultural land inventory is sufficient to meet the provincial food security challenge in perpetuity.

Finally, data are needed in two additional respects:

1. To feed the methods and techniques used to produce evidence for input to decisions by councils.
2. For internal and external research studies regarding the future states of agricultural land inventories.

The Universal Law of Location and its posit that something is everywhere therefore make a powerful contribution to substantive thinking about the role of data in decisions by councils which affect their agricultural land inventories, and about the food security consequences of decisions which deplete those inventories.

3. Utility of the Universal Law of Location as a Tool for Upgrading Evidence Used in Decisions by Councils Which Affect Municipal Agricultural Land Inventories

The utility of the Universal Law of Location is confirmed by (1) its contribution as a tool for upgrading data describing municipal agricultural land inventories over time and space, and (2) as a result of the data upgrading contribution, by the consequent contribution of upgrading decisions affecting the inventories of class 1, class 2, class 3, class 4, class 5, class 6. or class 7 agricultural land inventories.

Which brings us to several comments about the data-evidence relationship.

If a municipal government is using many or most of the methods and techniques listed in Table 3. Examples of Methods, Techniques, and Scenarios Found in Government, Advocacy Group, Professional Association, Academic, and Consultant Reports on Agricultural Land Research, then it appears fair to say that it already has a robust database for evidence generation purposes that can be accessed by council members.

However, if that is not the case, then some, many, most, and perhaps all the methods and techniques in Table 3 can contribute to the thinking of municipal governments about how to upgrade their data for input to methods and techniques which can be used to generate evidence to support decisions regarding changes to agricultural land inventories.

Moreover, most of the methods and techniques in Table 3 can be location-oriented in terms of functionality, which means that they can produce both spatial and aspatial evidence. Based on a failure to find or receive documentation to the contrary, it appears fair to say that the contribution of the Universal Law of Location in facilitating elaboration of this relationship is a major contribution to upgrading evidence used in decisions by councils which affect municipal agricultural land inventories.

Second, there is an intimate relationship between, for example, evidence demand, evidence production, and evidence use on the one hand and, on the other hand, the terms of reference for research studies, the design of research studies, the testing of research outcomes, and hundreds of other relationships between evidence and research studies.

The utility of the Universal Law of Location is therefore confirmed by its contribution to new ways of thinking about how to better use existing evidence to identify, adopt, and undertake new research studies.

Third, the discussion of why and how the zero-sum condition applies to municipal land inventories applies to data describing agricultural land acreages and non-agricultural land acreages, as well as to the evidence derived from applying spatial and aspatial methods and techniques to data on agricultural land acreages and non-agricultural land acreages.

The posit of combining the Universal Law of Location with the zero-sum condition that applies to any shift among land use acreages is a major contribution to upgrading the evidentiary validity of decisions affecting agricultural inventories within, adjacent to, and proximal to municipal boundaries.

4. Utility of the Universal Law of Location as a Tool for Upgrading Municipal Government Research Studies on the Province's Agricultural Land Inventory

In general, the quality of a research study *ceteris paribus* is largely a function of the quality of data and the quality of methods, techniques, and scenarios employed to produce evidence in a methodologically designed research framework.

In this case study the Universal Law of Location makes significant contributions to upgrading municipal government research studies on the province's agricultural land inventory by upgrading data and upgrading the evidence used in research studies to inform municipal councils, citizens, and other affected parties about identifying and, executing studies designed to better use, protect, and preserve Ontario's vulnerable and/or threatened agricultural land inventory.

L. Conclusion

This case study is based on a survey of 19 municipal councils, which finds that the Universal Law of Location:

1. Contributes to upgrading Ontario governments' data on the province's agricultural land inventory.
2. Contributes to upgrading the evidence used by Ontario governments to make decisions that affect the province's agricultural land inventory.
3. Contributes to terms of reference for data-driven and evidence-based studies to upgrade decisions that affect the province's agricultural land inventory and its state of food security.

It is therefore the consequent finding that the utility of the Universal Law of Location as a land use planning tool is confirmed.

Finally, as a result of this study, the conclusion reached by the previous study that the provincial government bore some and perhaps all responsibility for the destruction of agricultural land in Ontario, 2018-2025 is cause for deeper consideration.

That is, due to questions arising from the non-responses by the total population of 19 surveyed municipalities, this study concludes that some to many of Ontario's 444 municipalities could also be complicit in the destruction of Ontario's agricultural land inventory, 2018-2025, and post-2025 as well due to Official Plan and zoning changes made by councils in recent years.

M. Endnotes

1. Both broadcast and social media productions contain comments suggesting that provincial governments take a “big picture” approach to municipal planning and development, and do not get into the details. That impression is at stark odds with reality. The term “micromanage” aptly describes provincial government involvement in municipal planning and development matters by such decisions as relocating gas plants, putting beer in corner stores, removing bike lanes, providing funds for 400-series highway interchanges and road widenings using the pretext of “gridlock” when there has never been even one non-trivial incident of gridlock anywhere in Canada since 1867, and imposing housing construction targets and other initiatives through Ministerial Zoning Orders (MZOs). Moreover, and hence the connection of those micromanaging episodes to this research on the Universal Law of Location, the provincial government is directing where land uses already in place within municipal government boundaries are to be affected by land use changes dictated by the provincial government.

2. Even though they are creatures of the province, municipal governments have some room to manoeuvre in terms of what goes where, when, including the location of non-agricultural uses on agricultural land. As a result, decisions by municipal councils are pertinent to testing the utility of the Universal Law of Location and ascertaining their level of complicity in changes to the province's agricultural land inventory.

3. The term “indefinitely” is used to assert according to the forecasts that I was able to obtain after perhaps 30 hours of online searching, that there have been limited amounts of informed speculation much less methodologically designed research into how long food security will a matter of life and death for all Ontarians, or whether there will be any end to the need for class 1, class 2, class 3, class 4, class 5, class 6, or class 7

agricultural land which is sufficient in amount to indefinitely meet the needs of Ontario residents and enterprises.

4. Other factors outside prudent land management and good planning could be in play. Possibilities include not wanting to challenge the provincial government, and especially if funding strings are attached to implementing the provincial directive “or else”, and as well as complaints by citizens about questionable council decisions in favour of the development industry.

5. I have “roots” in the Little Clay Belt region of Northeastern Ontario, including a long-standing subscription to the Temiskaming Speaker. Looking across the fields, so to speak, the provincial loss of more than 125,000 acres of farmland per year, with a number of those lost acres in the highest-end classes of 1, 2, and 3, prompts questions about the future robustness of Ontario’s agricultural land inventory. The future of agricultural land in the Little Clay Belt is one of those questions, and area residents are fortunate that the Temiskaming Speaker reports on a topic that receives relatively limited consideration in Ontario’s metropolitan broadcast news sources.

6. It is fortunate that the editor published the letter in a timely manner so that it could be circulated while the project is in progress. As the reader has been informed, our immediate research focus is on testing the utility of the Universal Law of Location as a land use planning decision tool. However, our longer-term focus is on food security, and publication of the letter to the editor enables making that vital statement in this report.

7. The intention was to engage 24 or 25 municipalities. The number was reduced to 19 after a research design review revealed that 19 municipal governments are sufficient for a pilot study test of the utility of the Universal Law of Location as an agricultural land use planning decision tool.

8. Recent Ontario municipal and provincial elections, and the federal election campaigns in progress, are marked by citizen’s concerns about transparency and accountability failures on the parts of politicians at all levels of government. The IRB is aware of these concerns, as per previous reports such as [Interim Report 15. Identifying Tactics Used by Politicians to Restrict Citizens' Access to Public Records](#).

9. Sources for observations about actual and potential capabilities of land classes 1, 2, 3, 4, 5, 6 and 7 are cited in both this and the previous report, and in other reports produced by Ontario advocacy organizations such as Agricultural Adaptation Council, Farm & Food Care, Ontario Association of Agricultural Societies, Ontario Farmland Trust, Ontario Federation of Agriculture, and Ontario Soil and Crop Improvement Association.

10. The characteristics shown are sufficient for describing “evidence” in this case study involving municipal governments. Readers seeking more characteristics may find them via a Google search using a question such as “What are the characteristics of evidence?”, which yields 934,000,000 results.

11. Surveys of politicians at all levels frequently result in automatic ‘email received’ responses. Since automatic default responses with a general comment are of no informative value, in IRB reports they are deemed to be “No substantive response”.

12. If I am in error and an affected municipal council corrects the error, I ask to be provided a link to the correction so that I may amend this report accordingly.

13. As discussed in the provincial government report on Ontario ‘s agricultural land inventory ([Applying Universal Law of Location as a Land Use Planning Decision Tool: Ontario Government Data, Evidence, and Research Studies Must be Upgraded to Enable Informed Decisions that Best Use and Preserve the Province's Threatened Farmland Inventory](#)) and again in this report, the majority of provincial agencies have a primary interest in using agricultural land for non-agricultural purposes. That tendency will no doubt deepen and widen dramatically if the ‘Special economic zones’ bill passes. For details see:

https://www.villagereport.ca/village-picks/special-economic-zones-bill-would-let-ford-government-exempt-any-project-from-provincial-laws-10543737?utm_source=Email_Share&utm_medium=Email_Share&utm_campaign=Email_Share

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- **BeSpatial Ontario** members for valuable feedback during the BeSpatial Ontario annual conference.

APPENDICES

Appendices for Survey of Selected Municipal Governments Regarding Their Experience with Agricultural Land Inventory Change Data, Evidence, and Research Studies, 2018-2025

Applying Universal Law of Location as a Land Use Planning Decision Tool:
Forms for Survey of Selected Municipal Councils Describing Data, Evidence, and Research Studies Contributing to Decisions that Affect Ontario's Agricultural Land Inventory, 2018-2025

There are three forms to the survey of the 19 municipal government councils selected for this test of the utility of the Universal Law of Location as a land use planning decision tool. ([Applying Universal Law of Location as a Land Use Planning Decision Tool: Ontario Government Data, Evidence, and Research Studies Must be Upgraded to Enable Informed Decisions that Best Use and Preserve the Province's Threatened Farmland Inventory](#))

APPENDIX 1. UNIVERSAL LAW OF LOCATION TEST 4A. MUNICIPAL GOVERNMENT AGRICULTURAL LAND INVENTORY DATA, 2018-2025 INCLUSIVE

APPENDIX 2. UNIVERSAL LAW OF LOCATION TEST 4B. MUNICIPAL GOVERNMENT AGRICULTURAL LAND INVENTORY EVIDENCE, 2018-2025 INCLUSIVE

APPENDIX 3. UNIVERSAL LAW OF LOCATION TEST 4C, AGRICULTURAL LAND INVENTORY: MUNICIPAL GOVERNMENT INVENTORY RESEARCH STUDIES, 2018-2025 INCLUSIVE

APPENDIX 1. UNIVERSAL LAW OF LOCATION TEST 4A. MUNICIPAL GOVERNMENT AGRICULTURAL LAND INVENTORY DATA, 2018-2025 INCLUSIVE

Municipal Government	Response to Part 1		Response to Part 2	
	Yes	No	Yes	No
Bradford-West Gwillimbury (Town)		X		X
Brampton (City)		X		X
Brantford (City)		X		X
Cambridge (City)		X		X
Dufferin (County)		X		X
Grimsby (Town)		X		X
Guelph (City)		X		X
Halton (Region)		X		X
Hamilton (City)		X		X
London (City)		X		X
Markham (City)		X		X
Newmarket (Town)		X		X
Niagara (Region)		X		X
Ottawa (City)		X		X
Peterborough (City)		X		X
Temiskaming Shores (City)		X		X
Vaughan (City)		X		X
Wellington (County)		X		X
Wilmot (Township)		X		X

APPENDIX 2. UNIVERSAL LAW OF LOCATION TEST 4B. MUNICIPAL GOVERNMENT AGRICULTURAL LAND INVENTORY EVIDENCE, 2018-2025 INCLUSIVE

Municipal Government	Response to Part 1		Response to Part 2	
	Yes	No	Yes	No
Bradford-West Gwillimbury (Town)		X		X
Brampton (City)		X		X
Brantford (City)		X		X
Cambridge (City)		X		X
Dufferin (County)		X		X
Grimsby (Town)		X		X
Guelph (City)		X		X
Halton (Region)		X		X
Hamilton (City)		X		X
London (City)		X		X
Markham (City)		X		X
Newmarket (Town)		X		X
Niagara (Region)		X		X
Ottawa (City)		X		X
Peterborough (City)		X		X
Temiskaming Shores (City)		X		X
Vaughan (City)		X		X
Wellington (County)		X		X
Wilmot (Township)		X		X

APPENDIX 3. UNIVERSAL LAW OF LOCATION TEST 4C, AGRICULTURAL LAND INVENTORY: MUNICIPAL GOVERNMENT INVENTORY RESEARCH STUDIES, 2018-2025 INCLUSIVE

Municipal Government	Response to Part 1		Response to Part 2	
	Yes	No	Yes	No
Bradford-West Gwillimbury (Town)		X		X
Brampton (City)		X		X
Brantford (City)		X		X
Cambridge (City)		X		X
Dufferin (County)		X		X
Grimsby (Town)		X		X
Guelph (City)		X		X
Halton (Region)		X		X
Hamilton (City)		X		X
London (City)		X		X
Markham (City)		X		X
Newmarket (Town)		X		X
Niagara (Region)		X		X
Ottawa (City)		X		X
Peterborough (City)		X		X
Temiskaming Shores (City)		X		X
Vaughan (City)		X		X
Wellington (County)		X		X
Wilmot (Township)		X		X